



43568 YAFFA STREET LANCASTER, CA 93535

661/206-7728

Received & Inspected

MAR 12 2012

FCC Mail Room

February 21, 2012

Dear Federal Communications Commission
Attn: Disability Rights Office, Room 3-B431
445 12th Street, SW
Washington, DC 20554

Re: **Economically Burdensome Exemption from Closed Captioning
Requirements**

Dear Commission,

Gary Bell/GIG 2 Me Music and Video is a small sole proprietor video production company which is petitioning the Commission for an exemption from closed captioning rules that would be economically burdensome.

Gary Bell/GIG 2 Me Music and Video was recently discharged in Chapter 7 Bankruptcy (see accompanying document from US bankruptcy Court Central District of California).

In an effort to increase revenue and stay in business we are producing a 30-minute Infomercial for a local used car dealer with 2-3 inserts monthly of available cars. Inserts represent 50% of the Infomercial.

The Infomercial will run once a day on Saturday mornings in the local markets (not national)

The client is paying \$500.00 per show insert which is standard for this area. The client will not pay any additional costs.

Closed Captioning costs would add an additional \$235.00 per show insert leaving almost no profit for Gary Bell/GIG 2 Me Music and Video. (see accompanying document from Video Caption Corporation for costs and turn around time).

Adding closed captioning would also impact the editing turn around time by adding 3 extra days for **Video Caption Corporation** to caption the Infomercial. Because the client is a used car dealer they can not advertise cars that have sold. Therefore turn around time on producing and delivering the Infomercial inserts to the TV station to swap out is critical.

In addition, this type of car dealer Infomercial graphically and boldly depicts the type of vehicle, pricing and/or finance terms on screen as well as disclaimers which goes along with the audio. Adding closed captioning would mask these key visual elements. We believe this graphic depiction is a viable substitute for closed captioning and appreciate your consideration.

I declare that the above statements are true.



Gary Bell (owner)

3-5-12

DATE

Jurat

State of California

County of Los Angeles

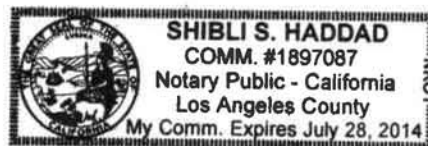
Subscribed and sworn to (or affirmed) before me on this 5th day of March,

2012 by Gary Bell,

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.


Signature

(Notary seal)



OPTIONAL INFORMATION

DESCRIPTION OF THE ATTACHED DOCUMENT

Affidavit Re: Economically Burdensome Exemption
(Title or description of attached document)

from Closed Captioning Requirements
(Title or description of attached document continued)

Number of Pages 2 Document Date 02-21-2012

(Additional information)

INSTRUCTIONS FOR COMPLETING THIS FORM

The wording of all Jurats completed in California after January 1, 2008 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and County information must be the State and County where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date that the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
 - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
 - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document

**United States Bankruptcy Court
Central District Of California**

255 East Temple Street, Los Angeles, CA 90012

DISCHARGE OF DEBTOR

DEBTOR INFORMATION:

Gary L Bell
aka Karen E Bell, dba Gig 2 Me Music & Video

BANKRUPTCY NO. 2:11-bk-45058-EC

CHAPTER 7

Last four digits of Social-Security or Individual Taxpayer-Identification (ITIN) No(s), (if any): xxx-xx-9536
Employer Tax-Identification (EIN) No(s), (if any): N/A
Debtor Discharge Date: 12/16/11

JOINT DEBTOR INFORMATION:

Karen E Miller
aka Karen Elizabeth Bell, aka Karen Elizabeth Miller-Bell

Last four digits of Social-Security or Individual Taxpayer-Identification (ITIN) No(s), (if any): xxx-xx-4983
Employer Tax-Identification (EIN) No(s), (if any): N/A
Joint Debtor Discharge Date: 12/16/11

Address:
43568 Yaffa Street
Lancaster, CA 93535

It appearing that the debtor is entitled to a discharge, IT IS ORDERED: The debtor is granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

BY THE COURT,

Dated: December 16, 2011

Kathleen J. Campbell
Clerk of the Court

SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION

** Set forth all names, including trade names, used by the debtor(s) within the last 8 years. For joint debtors, set forth the last four digits of both social-security numbers or individual taxpayer-identification numbers.*

Subject: Captioning Your 30-minute Show
From: Constance Carlson (ccarlson@vicaps.com)
To: gigtwome@yahoo.com;
Date: Tuesday, January 24, 2012 8:02 AM

Hi Karen and Gary,

Good speaking with you yesterday! Again, we'd be delighted to assist you with the captioning of your infomercial. As I understand it, you would supply your show to us on minDV. Our deliverable to you would be a Closed Caption Master (Basic Roll-up Style Captions) encoded to to DVCAM, DVCPRO, or BETASP (please advise your preferred tape type).

Pricing: \$235 per show

Price includes transcription, captioning (Basic Roll-up Style Captions), encoding, and tape stock. Our standard turnaround is 3 business days. Faster turnarounds are available at additional charge. Shipping and handling are additional.

Please let me know if you have any questions – I'll follow up next week as promised!

Constance

Constance Carlson

Vice President, Sales & Marketing



NEW YORK | BURBANK

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